

EXHIBIT V

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ORACLE AMERICA, INC.,)
Plaintiff,) Case No.
vs.) CV 10-03561 WHA
GOOGLE, INC.,)
Defendant.)
_____)

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VIDEOTAPED 30(b)(6) DEPOSITION OF GOOGLE, INC.
DESIGNEE: ANWAR GHULOUM
Palo Alto, California
Wednesday, December 9, 2015

Reported by:
KELLI COMBS, CSR No. 7705
Job No. 2189230
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1 data types, I/O, math functions, you know, string
2 support and so on.

3 Q Does a developer using -- developing for
4 Brillo use, for example -- create, for example,
5 objects using the Java programming language?

6 MR. KWUN: Objection; foundation.

7 THE WITNESS: No. No, I don't believe so.

8 BY MR. RAMSEY:

9 Q So just do developers only write in the C
10 programming language using --

11 MR. KWUN: Objection.

12 BY MR. RAMSEY:

13 Q -- when developing for Brillo?

14 MR. KWUN: No objection.

15 THE WITNESS: Yes, I believe that's
16 currently the case.

17 BY MR. RAMSEY:

18 Q Are you familiar with something called
19 Weave?

20 A Somewhat, yes.

21 Q What is your understanding of Weave?

22 A Weave is a protocol that has evolved over
23 time, but the most basic and correct definition of
24 it is a protocol for devices to communicate to each
25 other and to -- for example, one of these --

1 (Reporter clarification.)

2 THE WITNESS: Internet of Things devices,
3 which I'll just call IOT just to shorten it. So if
4 you hear IOT, that's what I mean.

5 -- IOT devices to -- to tell a -- another
6 device like a phone or another peer device what kind
7 of capabilities it has. So that is something that
8 Brillo is using to support device discovery and --
9 discovery in terms of presence of the device, its
10 capabilities and communication with the device.

11 BY MR. RAMSEY:

12 Q So is Weave a -- a software suite or is
13 it --

14 You used the word "protocol." Is it
15 something different than software?

16 A It's a protocol, but as with all things
17 protocols, there are manifestations or
18 implementations of that protocol on different
19 devices.

20 Q Are you familiar with something called
21 ARC Welder?

22 A ARC Welder. I'm thinking. Sounds vaguely
23 familiar, but I don't recall.

24 Q Are you aware of any efforts at Google to
25 integrate Android into Chrome?

1 A Yes.

2 Q Describe for me your understanding of
3 those efforts at Google.

4 MR. KWUN: Objection; beyond the scope.

5 THE WITNESS: So there's a -- maybe this
6 is what you're referring to. There is a project
7 called ARC, which is -- I think stands for Android
8 Runtime for Chrome, which is basically embedding
9 within a sandbox a version of the Android Runtime
10 running.

11 BY MR. RAMSEY:

12 Q So when you say "embedded version of the
13 Android Runtime," do you mean the Dalvik or ART --
14 Dalvik Virtual Machine or ART in connection with the
15 core libraries?

16 MR. KWUN: Objection; form.

17 THE WITNESS: I mean, yes, that and -- and
18 frameworks and -- and so on. So we're basically
19 running a version of the Android stack inside this,
20 what we call, a native client container where you
21 can run native apps in Chrome. There's this
22 capability to run native apps, so we run that as a
23 native app in Chrome.

24 BY MR. RAMSEY:

25 Q So today, versions of Chrome that are

1 shipped, are they shipped with a version of the
2 Android Runtime contained therein?

3 MR. KWUN: Objection; foundation.

4 THE WITNESS: I'm not entirely sure how
5 it's shipped. Here's what I think is how it's
6 shipped, which is that -- so the capability to run
7 native code is, you know, through native client
8 is -- is in a shipping and Chrome, and that has
9 nothing to do with Android or Android code or
10 anything like that.

11 I believe ARC support is provided through
12 an add-on plug-in afterwards that you install. That
13 certainly was the case before. I don't know if
14 that's changed. Now, with that plug-in, then, you
15 can download apps and then run them within a Chrome
16 sandbox process.

17 BY MR. RAMSEY:

18 Q Do you know the purpose of ARC; why it's
19 being offered?

20 MR. KWUN: Objection; form.

21 THE WITNESS: I mean, the obvious thing,
22 which is that to allow people running Chrome to run
23 select Android apps.

24 BY MR. RAMSEY:

25 Q Why do you say "select Android apps"?

1 A I don't know if this changed yet, but the
2 program is fairly early, and they worked closely
3 with partners to make sure that they delivered a
4 good experience, I think, on -- on Chrome. I
5 haven't tracked ARC all that closely lately. Early
6 on, I was more familiar with it.

7 MR. RAMSEY: Can we just take a brief
8 break? I'm going to look through documents, and I
9 think we're not too far away. Maybe an hour. Let
10 me just look through some documents, and we'll see
11 how quickly we can wrap this up.

12 MR. KWUN: Okay. That's fine. I mean, if
13 we're going to just -- we're talking about a
14 relatively short break?

15 MR. RAMSEY: Yeah. Like 10 minutes. I
16 need 10 minutes. I'm trying to make better use of
17 the time, not worse use.

18 MR. KWUN: Understood.

19 THE VIDEOGRAPHER: We are off the record
20 at 2:36 p.m.

21 (Recess taken.)

22 THE VIDEOGRAPHER: We're back on the
23 record at 2:53 p.m.

24 BY MR. RAMSEY:

25 Q All right.

1 I, the undersigned, a Certified Shorthand
2 Reporter of the State of California, do hereby certify:

3 That the foregoing proceedings were taken
4 before me at the time and place herein set forth; that
5 any witnesses in the foregoing proceedings, prior to
6 testifying, were administered an oath; that a record of
7 the proceedings was made by me using machine shorthand
8 which was thereafter transcribed under my direction;
9 that the foregoing transcript is a true record of the
10 testimony given.

11 Further, that the foregoing pertains to the
12 original transcript of a deposition in a Federal Case,
13 before completion of the proceedings, a review of the
14 transcript [X] was [] was not requested.

15 I further certify I am neither financially
16 interested in the action nor a relative or employee of
17 any attorney or any party to this action.

18 IN WITNESS WHEREOF, I have this date
19 subscribed my name.

20
21 Dated: 12/14/15

22
23 
24

KELLI COMBS

25 CSR No. 7705